



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

able hypothesis, other than the prisoner's guilt, it is entitled to the same weight as direct testimony.

10. APPEAL AND ERROR—*Instructions—Evidence to support—Presumption.* Where the evidence is not certified to this court by proper bill of exception, it will be presumed that there was evidence before the trial court to support the instructions given by it.

11. INSTRUCTIONS—*Oral explanations*—A trial court may give oral explanations of written instructions, and if the two taken together clearly and accurately state the law, it is sufficient.

12. INSTRUCTIONS—*Jury fully instructed.* It is not error to refuse to further instruct the jury when they have already been fully instructed.

VAN LANDINGHAM V. BUENA VISTA IMPROVEMENT COMPANY.—

Decided at Richmond, December 13, 1900.—*Keith, P:*

1. DELINQUENT LANDS—*Deeds—Right to redeem—Waste—Rents.* A purchaser at a sale of land sold for delinquent taxes cannot acquire a deed thereto within two years after the date of his purchase, and if more than three years elapse after the date of sale, the former owner or a creditor holding a lien on the land may redeem the land at any time before a deed is made or ordered to the purchaser. Such purchaser is liable for waste committed before acquiring a valid deed, and for rents collected.

TURNBULL V. MANN.—Decided at Richmond, December 13, 1900.—

Phlegar, J:

1. CONTRACTS—*Incomplete on face—Delivery—Presumption.* In the absence of evidence to the contrary, the presumption is that a bond naming the obligors but having one more seal than signature was delivered by all who signed it and not that it was delivered by some of them to one, to be by the latter delivered when fully completed. If delivery by all, it is the binding obligation of all, unless, at the time of delivery, the condition upon which it was to become obligatory was made known to the obligor.

2. CONTRACTS—*Incompleteness—Delivery—Presumption.* In the absence of evidence to the contrary, the presumption from an unconditional delivery of an instrument incomplete on its face is that the incompleteness is waived.

3. CHANCERY PRACTICE—*Approving acts of receiver—Collateral attack.* A decree approving the action of a receiver of the court in a case when the court had jurisdiction of the subject-matter and of the parties cannot be attacked in a collateral proceeding, but must remain in force until reversed on appeal or by proper proceedings in that case.

4. JUDICIAL SALES—*Purchaser—Party.* A purchaser at a judicial sale is a party to the suit in which he purchases, and is bound by the decree of sale and subsequent decrees in the cause affecting his interest. He is obliged to pay his purchase money as the court directs and will be protected in so doing.

5. JUDGMENTS—*Collateral attack—Evidence.* A commissioner's deed of real estate, and the decrees of courts of competent jurisdiction under which the deed